

FEDERAL OPERATING PERMIT

A FEDERAL OPERATING PERMIT IS HEREBY ISSUED TO
El Paso Natural Gas Company, L.L.C.

AUTHORIZING THE OPERATION OF
Cornudas Compressor Station
Pipeline Transportation of Natural Gas

LOCATED AT
Hudspeth County, Texas
Latitude 31° 42' 12" Longitude 105° 27' 23"
Regulated Entity Number: RN100211929

This permit is issued in accordance with and subject to the Texas Clean Air Act (TCAA), Chapter 382 of the Texas Health and Safety Code and Title 30 Texas Administrative Code Chapter 122 (30 TAC Chapter 122), Federal Operating Permits. Under 30 TAC Chapter 122, this permit constitutes the permit holder's authority to operate the site and emission units listed in this permit. Operations of the site and emission units listed in this permit are subject to all additional rules or amended rules and orders of the Commission pursuant to the TCAA.

This permit does not relieve the permit holder from the responsibility of obtaining New Source Review authorization for new, modified, or existing facilities in accordance with 30 TAC Chapter 116, Control of Air Pollution by Permits for New Construction or Modification.

The site and emission units authorized by this permit shall be operated in accordance with 30 TAC Chapter 122, the general terms and conditions, special terms and conditions, and attachments contained herein.

This permit shall expire five years from the date of issuance. The renewal requirements specified in 30 TAC § 122.241 must be satisfied in order to renew the authorization to operate the site and emission units.

Permit No: O3166 Issuance Date: _____

For the Commission

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General Terms and Conditions

The permit holder shall comply with all terms and conditions contained in 30 TAC § 122.143 (General Terms and Conditions), 30 TAC § 122.144 (Recordkeeping Terms and Conditions), 30 TAC § 122.145 (Reporting Terms and Conditions), and 30 TAC § 122.146 (Compliance Certification Terms and Conditions).

In accordance with 30 TAC § 122.144(1), records of required monitoring data and support information required by this permit, or any applicable requirement codified in this permit, are required to be maintained for a period of five years from the date of the monitoring report, sample, or application unless a longer data retention period is specified in an applicable requirement. The five year record retention period supersedes any less stringent retention requirement that may be specified in a condition of a permit identified in the New Source Review Authorization attachment.

If the permit holder chooses to demonstrate that this permit is no longer required, a written request to void this permit shall be submitted to the Texas Commission on Environmental Quality (TCEQ) by the Responsible Official in accordance with 30 TAC § 122.161(e). The permit holder shall comply with the permit's requirements, including compliance certification and deviation reporting, until notified by the TCEQ that this permit is voided.

The permit holder shall comply with 30 TAC Chapter 116 by obtaining a New Source Review authorization prior to new construction or modification of emission units located in the area covered by this permit.

All reports required by this permit must include in the submittal a cover letter which identifies the following information: company name, TCEQ regulated entity number, air account number (if assigned), site name, area name (if applicable), and Air Permits Division permit number(s).

Special Terms and Conditions:

Emission Limitations and Standards, Monitoring and Testing, and Recordkeeping and Reporting

1. Permit holder shall comply with the following requirements:
 - A. Emission units (including groups and processes) in the Applicable Requirements Summary attachment shall meet the limitations, standards, equipment specifications, monitoring, recordkeeping, reporting, testing, and other requirements listed in the Applicable Requirements Summary attachment to assure compliance with the permit.
 - B. The textual description in the column titled "Textual Description" in the Applicable Requirements Summary attachment is not enforceable and is not deemed as a substitute for the actual regulatory language. The Textual Description is provided for information purposes only.
 - C. A citation listed on the Applicable Requirements Summary attachment, which has a notation [G] listed before it, shall include the referenced section and subsection for all commission rules, or paragraphs for all federal and state regulations and all subordinate paragraphs, subparagraphs and clauses, subclauses, and items contained within the referenced citation as applicable requirements.
 - D. When a grouped citation, notated with a [G] in the Applicable Requirements Summary, contains multiple compliance options, the permit holder must keep records of when each compliance option was used.

- E. Emission units subject to 40 CFR Part 63, Subpart ZZZZ, as identified in the attached Applicable Requirements Summary table, are subject to 30 TAC Chapter 113, Subchapter C, §113.1090, which incorporates the 40 CFR Part 63 Subpart by reference.
2. The permit holder shall comply with the following sections of 30 TAC Chapter 101 (General Air Quality Rules):
- A. Title 30 TAC § 101.1 (relating to Definitions), insofar as the terms defined in this section are used to define the terms used in other applicable requirements
 - B. Title 30 TAC § 101.3 (relating to Circumvention)
 - C. Title 30 TAC § 101.8 (relating to Sampling), if such action has been requested by the TCEQ
 - D. Title 30 TAC § 101.9 (relating to Sampling Ports), if such action has been requested by the TCEQ
 - E. Title 30 TAC § 101.10 (relating to Emissions Inventory Requirements)
 - F. Title 30 TAC § 101.201 (relating to Emission Event Reporting and Recordkeeping Requirements)
 - G. Title 30 TAC § 101.211 (relating to Scheduled Maintenance, Start-up, and Shutdown Reporting and Recordkeeping Requirements)
 - H. Title 30 TAC § 101.221 (relating to Operational Requirements)
 - I. Title 30 TAC § 101.222 (relating to Demonstrations)
 - J. Title 30 TAC § 101.223 (relating to Actions to Reduce Excessive Emissions)
3. Permit holder shall comply with the following requirements of 30 TAC Chapter 111:
- A. Visible emissions from stationary vents with a flow rate of less than 100,000 actual cubic feet per minute that are not listed in the Applicable Requirements Summary attachment for 30 TAC Chapter 111, Subchapter A, Division 1, shall not exceed 20% opacity averaged over a six minute period. The permit holder shall comply with the following requirements for stationary vents at the site subject to this standard:
 - (i) Title 30 TAC § 111.111(a)(1)(B) (relating to Requirements for Specified Sources)
 - (ii) Title 30 TAC § 111.111(a)(1)(E)
 - (iii) Title 30 TAC § 111.111(a)(1)(F)(i), (ii), (iii), or (iv)
 - (iv) For emission units with vent emissions subject to 30 TAC § 111.111(a)(1)(B), complying with 30 TAC § 111.111(a)(1)(F)(ii), (iii), or (iv), and capable of producing visible emissions from, but not limited to, particulate matter, acid gases and NO_x, the permit holder shall also comply with the following periodic monitoring requirements for the purpose of annual compliance certification under 30 TAC § 122.146. These periodic monitoring requirements do not apply to vents that are not capable of producing visible emissions such as vents that emit only colorless VOCs; vents from non-fuming liquids; vents that provide passive ventilation, such as plumbing vents; or vent emissions from any other source that

does not obstruct the transmission of light. Vents, as specified in the “Applicable Requirements Summary” attachment, that are subject to the emission limitation of 30 TAC § 111.111(a)(1)(B) are not subject to the following periodic monitoring requirements:

- (1) An observation of stationary vents from emission units in operation shall be conducted at least once during each calendar quarter unless the emission unit is not operating for the entire quarter.
- (2) For stationary vents from a combustion source, if an alternative to the normally fired fuel is fired for a period greater than or equal to 24 consecutive hours, the permit holder shall conduct an observation of the stationary vent for each such period to determine if visible emissions are present. If such period is greater than 3 months, observations shall be conducted once during each quarter. Supplementing the normally fired fuel with natural gas or fuel gas to increase the net heating value to the minimum required value does not constitute creation of an alternative fuel.
- (3) Records of all observations shall be maintained.
- (4) Visible emissions observations of emission units operated during daylight hours shall be conducted no earlier than one hour after sunrise and no later than one hour before sunset. Visible emissions observations of emission units operated only at night must be made with additional lighting and the temporary installation of contrasting backgrounds. Visible emissions observations shall be made during times when the activities described in 30 TAC § 111.111(a)(1)(E) are not taking place. Visible emissions shall be determined with each stationary vent in clear view of the observer. The observer shall be at least 15 feet, but not more than 0.25 mile, away from each stationary vent during the observation. For outdoor locations, the observer shall select a position where the sun is not directly in the observer’s eyes. When condensed water vapor is present within the plume, as it emerges from the emissions outlet, observations must be made beyond the point in the plume at which condensed water vapor is no longer visible. When water vapor within the plume condenses and becomes visible at a distance from the emissions outlet, the observation shall be evaluated at the outlet prior to condensation of water vapor. A certified opacity reader is not required for visible emissions observations.
- (5) Compliance Certification:
 - (a) If visible emissions are not present during the observation, the RO may certify that the source is in compliance with the applicable opacity requirement in 30 TAC § 111.111(a)(1) and (a)(1)(B).
 - (b) However, if visible emissions are present during the observation, the permit holder shall either list this occurrence as a deviation on the next deviation report as required under 30 TAC § 122.145(2) or conduct the appropriate opacity test specified in 30 TAC § 111.111(a)(1)(F) as soon as practicable, but no later than 24 hours after observing visible emissions to determine if the source is in compliance with the opacity requirements. If an opacity test is performed and the source is

determined to be in compliance, the RO may certify that the source is in compliance with the applicable opacity requirement. However, if an opacity test is performed and the source is determined to be out of compliance, the permit holder shall list this occurrence as a deviation on the next deviation report as required under 30 TAC § 122.145(2). The opacity test must be performed by a certified opacity reader.

- (c) Some vents may be subject to multiple visible emission or monitoring requirements. All credible data must be considered when certifying compliance with this requirement even if the observation or monitoring was performed to demonstrate compliance with a different requirement.
- B. Emission limits on nonagricultural processes, except for the steam generators specified in 30 TAC § 111.153, shall comply with the following requirements:
 - (i) Emissions of PM from any source may not exceed the allowable rates as required in 30 TAC § 111.151(a) (relating to Allowable Emissions Limits)
 - (ii) Sources with an effective stack height (h_e) less than the standard effective stack height (H_e), must reduce the allowable emission level by multiplying it by $[h_e/H_e]^2$ as required in 30 TAC § 111.151(b)
 - (iii) Effective stack height shall be calculated by the equation specified in 30 TAC § 111.151(c)
- C. Outdoor burning, as stated in 30 TAC § 111.201, shall not be authorized unless the following requirements are satisfied:
 - (i) Title 30 TAC § 111.207 (relating to Exception for Recreation, Ceremony, Cooking, and Warmth)
 - (ii) Title 30 TAC § 111.219 (relating to General Requirements for Allowable Outdoor Burning)
 - (iii) Title 30 TAC § 111.221 (relating to Responsibility for Consequences of Outdoor Burning)
- 4. The permit holder shall comply with the following requirements for units subject to any subpart of 40 CFR Part 60, unless otherwise stated in the applicable subpart:
 - A. Title 40 CFR § 60.7 (relating to Notification and Recordkeeping)
 - B. Title 40 CFR § 60.8 (relating to Performance Tests)
 - C. Title 40 CFR § 60.11 (relating to Compliance with Standards and Maintenance Requirements)
 - D. Title 40 CFR § 60.12 (relating to Circumvention)
 - E. Title 40 CFR § 60.13 (relating to Monitoring Requirements)
 - F. Title 40 CFR § 60.14 (relating to Modification)

- G. Title 40 CFR § 60.15 (relating to Reconstruction)
 - H. Title 40 CFR § 60.19 (relating to General Notification and Reporting Requirements)
5. The permit holder shall comply with the requirements of 30 TAC Chapter 113, Subchapter C, § 113.100 for units subject to any subpart of 40 CFR Part 63, unless otherwise stated in the applicable subpart.
 6. The permit holder shall comply with certified registrations submitted to the TCEQ for purposes of establishing federally enforceable emission limits. A copy of the certified registration shall be maintained with the permit. Records sufficient to demonstrate compliance with the established limits shall be maintained. The certified registration and records demonstrating compliance shall be provided, on request, to representatives of the appropriate TCEQ regional office and any local air pollution control agency having jurisdiction over the site. The permit holder shall submit updated certified registrations when changes at the site require establishment of new emission limits. If changes result in emissions that do not remain below major source thresholds, the permit holder shall submit a revision application to codify the appropriate requirements in the permit.

Additional Monitoring Requirements

7. The permit holder shall comply with the periodic monitoring requirements as specified in the attached "Periodic Monitoring Summary" upon issuance of the permit. Except for, as applicable, monitoring malfunctions, associated repairs, and required quality assurance or control activities (including, as applicable, calibration checks and required zero and span adjustments), the permit holder shall conduct all monitoring in continuous operation (or shall collect data at all required intervals) at all times that the pollutant-specific emissions unit is operating. The permit holder may elect to collect monitoring data on a more frequent basis and average the data, consistent with the averaging time or minimum frequency specified in the "Periodic Monitoring Summary," for purposes of determining whether a deviation has occurred. However, the additional data points must be collected on a regular basis. In no event shall data be collected and used in particular instances to avoid reporting deviations. Deviations shall be reported according to 30 TAC § 122.145 (Reporting Terms and Conditions).

New Source Review Authorization Requirements

8. Permit holder shall comply with the requirements of New Source Review authorizations issued or claimed by the permit holder for the permitted area, including permits, permits by rule (including the terms, conditions, monitoring, recordkeeping, and reporting identified in registered PBRs and permits by rule identified in the PBR Supplemental Tables dated March 28, 2025 in the application for project 36690), standard permits, flexible permits, special permits, permits for existing facilities including Voluntary Emissions Reduction Permits and Electric Generating Facility Permits issued under 30 TAC Chapter 116, Subchapter I, or special exemptions referenced in the New Source Review Authorization References attachment. These requirements:
 - A. Are incorporated by reference into this permit as applicable requirements
 - B. Shall be located with this operating permit
 - C. Are not eligible for a permit shield
9. The permit holder shall comply with the general requirements of 30 TAC Chapter 106, Subchapter A or the general requirements, if any, in effect at the time of the claim of any PBR.

10. The permit holder shall maintain records to demonstrate compliance with any emission limitation or standard that is specified in a permit by rule (PBR) or Standard Permit listed in the New Source Review Authorizations attachment. The records shall yield reliable data from the relevant time period that are representative of the emission unit's compliance with the PBR or Standard Permit. These records may include, but are not limited to, production capacity and throughput, hours of operation, safety data sheets (SDS), chemical composition of raw materials, speciation of air contaminant data, engineering calculations, maintenance records, fugitive data, performance tests, capture/control device efficiencies, direct pollutant monitoring (CEMS, COMS, or PEMS), or control device parametric monitoring. These records shall be made readily accessible and available as required by 30 TAC § 122.144. Any monitoring or recordkeeping data indicating noncompliance with the PBR or Standard Permit shall be considered and reported as a deviation according to 30 TAC § 122.145 (Reporting Terms and Conditions).

Compliance Requirements

11. The permit holder shall certify compliance in accordance with 30 TAC § 122.146. The permit holder shall comply with 30 TAC § 122.146 using at a minimum, but not limited to, the continuous or intermittent compliance method data from monitoring, recordkeeping, reporting, or testing required by the permit and any other credible evidence or information. The certification period may not exceed 12 months and the certification must be submitted within 30 days after the end of the period being certified.
12. Use of Discrete Emission Credits to comply with the applicable requirements:
 - A. Unless otherwise prohibited, the permit holder may use discrete emission credits to comply with the following applicable requirements listed elsewhere in this permit:
 - (i) Title 30 TAC Chapter 115
 - (ii) Title 30 TAC Chapter 117
 - (iii) If applicable, offsets for Title 30 TAC Chapter 116
 - (iv) Temporarily exceed state NSR permit allowables
 - B. The permit holder shall comply with the following requirements in order to use the credit to comply with the applicable requirements:
 - (i) The permit holder must notify the TCEQ according to 30 TAC § 101.376(d)
 - (ii) The discrete emission credits to be used must meet all the geographic, timeliness, applicable pollutant type, and availability requirements listed in 30 TAC Chapter 101, Subchapter H, Division 4
 - (iii) The executive director has approved the use of the discrete emission credits according to 30 TAC § 101.376(d)(1)(A)
 - (iv) The permit holder keeps records of the use of credits towards compliance with the applicable requirements in accordance with 30 TAC § 101.372(h) and 30 TAC Chapter 122
 - (v) Title 30 TAC § 101.375 (relating to Emission Reductions Achieved Outside the United States)

Permit Location

13. The permit holder shall maintain a copy of this permit and records related to requirements listed in this permit at El Paso Area Office, 12600 McCombs, El Paso, TX 79934.

Permit Shield (30 TAC § 122.148)

14. A permit shield is granted for the emission units, groups, or processes specified in the attached "Permit Shield." Compliance with the conditions of the permit shall be deemed compliance with the specified potentially applicable requirements or specified potentially applicable state-only requirements listed in the attachment "Permit Shield." Permit shield provisions shall not be modified by the executive director until notification is provided to the permit holder. No later than 90 days after notification of a change in a determination made by the executive director, the permit holder shall apply for the appropriate permit revision to reflect the new determination. Provisional terms are not eligible for this permit shield. Any term or condition, under a permit shield, shall not be protected by the permit shield if it is replaced by a provisional term or condition or the basis of the term and condition changes.

Attachments

Applicable Requirements Summary

Additional Monitoring Requirements

Permit Shield

New Source Review Authorization References

Applicable Requirements Summary

Unit Summary 10

Applicable Requirements Summary 11

Note: A “none” entry may be noted for some emission sources in this permit’s “Applicable Requirements Summary” under the heading of “Monitoring and Testing Requirements” and/or “Recordkeeping Requirements” and/or “Reporting Requirements.” Such a notation indicates that there are no requirements for the indicated emission source as identified under the respective column heading(s) for the stated portion of the regulation when the emission source is operating under the conditions of the specified SOP Index Number. However, other relevant requirements pursuant to 30 TAC Chapter 122 including Recordkeeping Terms and Conditions (30 TAC § 122.144), Reporting Terms and Conditions (30 TAC § 122.145), and Compliance Certification Terms and Conditions (30 TAC § 122.146) continue to apply.

Unit Summary

Unit/Group/ Process ID No.	Unit Type	Group/Inclusive Units	SOP Index No.	Regulation	Requirement Driver
AUX 01	EMISSION POINTS/STATIONARY VENTS/PROCESS VENTS	N/A	R1111-1	30 TAC Chapter 111, Visible Emissions	No changing attributes.
AUX 01	SRIC ENGINES	N/A	63ZZZZ-1	40 CFR Part 63, Subpart ZZZZ	No changing attributes.
GRP-HEATERS	EMISSION POINTS/STATIONARY VENTS/PROCESS VENTS	HTR-1, HTR-2	R1111-2	30 TAC Chapter 111, Visible Emissions	No changing attributes.
GRP-TURBINES 1	EMISSION POINTS/STATIONARY VENTS/PROCESS VENTS	TURB A1, TURB A2, TURB A3	R1111-2	30 TAC Chapter 111, Visible Emissions	No changing attributes.
GRP-TURBINES 2	EMISSION POINTS/STATIONARY VENTS/PROCESS VENTS	TURB C1, TURB C2	R1111-1	30 TAC Chapter 111, Visible Emissions	No changing attributes.
GRP-TURBINES 2	STATIONARY TURBINES	TURB C1, TURB C2	60GG-1	40 CFR Part 60, Subpart GG	No changing attributes.
TURB B1	EMISSION POINTS/STATIONARY VENTS/PROCESS VENTS	N/A	R1111-1	30 TAC Chapter 111, Visible Emissions	No changing attributes.
TURB B1	STATIONARY TURBINES	N/A	60GG-1	40 CFR Part 60, Subpart GG	No changing attributes.

Applicable Requirements Summary

Unit Group Process ID No.	Unit Group Process Type	SOP Index No.	Pollutant	State Rule or Federal Regulation Name	Emission Limitation, Standard or Equipment Specification Citation	Textual Description (See Special Term and Condition 1.B.)	Monitoring And Testing Requirements	Recordkeeping Requirements (30 TAC § 122.144)	Reporting Requirements (30 TAC § 122.145)
AUX 01	EP	R1111-1	Opacity	30 TAC Chapter 111, Visible Emissions	§ 111.111(a)(1)(B) § 111.111(a)(1)(E)	Visible emissions from any stationary vent shall not exceed an opacity of 20% averaged over a six minute period for any source on which construction was begun after January 31, 1972.	[G]§ 111.111(a)(1)(F) ** See Periodic Monitoring Summary	None	None
AUX 01	EU	63ZZZZ-1	112(B) HAPS	40 CFR Part 63, Subpart ZZZZ	§ 63.6603(a)-Table 2d.7 § 63.6595(a)(1) § 63.6605(a) § 63.6605(b) § 63.6625(e) § 63.6625(h) § 63.6625(j)	For each existing non-emergency, non-black start 4SLB stationary RICE with a site rating less than or equal to 500 HP, located at an area source, you must comply with the requirements as specified in Table 2d.7.a-c.	§ 63.6625(j) § 63.6640(a) § 63.6640(a)-Table 6.9.a.i § 63.6640(a)-Table 6.9.a.ii	§ 63.6625(j) § 63.6655(e) § 63.6660(a) § 63.6660(b) § 63.6660(c)	§ 63.6640(e) § 63.6650(f)
GRP-HEATERS	EP	R1111-2	Opacity	30 TAC Chapter 111, Visible Emissions	§ 111.111(a)(1)(A) § 111.111(a)(1)(E)	Visible emissions from any stationary vent shall not exceed an opacity of 30% averaged over a six minute period.	[G]§ 111.111(a)(1)(F) ** See Periodic Monitoring Summary	None	None
GRP-TURBINES 1	EP	R1111-2	Opacity	30 TAC Chapter 111, Visible Emissions	§ 111.111(a)(1)(A) § 111.111(a)(1)(E)	Visible emissions from any stationary vent shall not exceed an opacity of 30% averaged over a six minute period.	[G]§ 111.111(a)(1)(F) ** See Periodic Monitoring Summary	None	None
GRP-TURBINES 2	EP	R1111-1	Opacity	30 TAC Chapter 111, Visible Emissions	§ 111.111(a)(1)(B) § 111.111(a)(1)(E)	Visible emissions from any stationary vent shall not exceed an opacity of 20% averaged over a six minute period for any source on which construction was begun after January 31, 1972.	[G]§ 111.111(a)(1)(F) ** See Periodic Monitoring Summary	None	None
GRP-	EU	60GG-1	NO _x	40 CFR Part 60,	§ 60.332(a)(2)	No owner or operator shall	[G]§ 60.335(a)	None	None

Applicable Requirements Summary

Unit Group Process ID No.	Unit Group Process Type	SOP Index No.	Pollutant	State Rule or Federal Regulation Name	Emission Limitation, Standard or Equipment Specification Citation	Textual Description (See Special Term and Condition 1.B.)	Monitoring And Testing Requirements	Recordkeeping Requirements (30 TAC § 122.144)	Reporting Requirements (30 TAC § 122.145)
TURBINES 2				Subpart GG	§ 60.332(a)(3) § 60.332(k)	discharge into the atmosphere from any stationary gas turbine, any gases which contain nitrogen oxides in excess of the amount as determined from the specified equation.	§ 60.335(b)(1) § 60.335(b)(2) § 60.335(c)(1) ** See Periodic Monitoring Summary		
GRP-TURBINES 2	EU	60GG-1	SO ₂	40 CFR Part 60, Subpart GG	§ 60.333(b)	No stationary gas turbine shall burn any fuel which contains sulfur in excess of 0.8% by weight.	§ 60.334(h) [G]§ 60.334(h)(3)	None	None
TURB B1	EP	R1111-1	Opacity	30 TAC Chapter 111, Visible Emissions	§ 111.111(a)(1)(B) § 111.111(a)(1)(E)	Visible emissions from any stationary vent shall not exceed an opacity of 20% averaged over a six minute period for any source on which construction was begun after January 31, 1972.	[G]§ 111.111(a)(1)(F) ** See Periodic Monitoring Summary	None	None
TURB B1	EU	60GG-1	SO ₂	40 CFR Part 60, Subpart GG	§ 60.333(b)	No stationary gas turbine shall burn any fuel which contains sulfur in excess of 0.8% by weight.	§ 60.334(h) [G]§ 60.334(h)(3)	None	None

Additional Monitoring Requirements

Periodic Monitoring Summary 14

Periodic Monitoring Summary

Unit/Group/Process Information	
ID No.: AUX 01	
Control Device ID No.: N/A	Control Device Type: N/A
Applicable Regulatory Requirement	
Name: 30 TAC Chapter 111, Visible Emissions	SOP Index No.: R1111-1
Pollutant: Opacity	Main Standard: § 111.111(a)(1)(B)
Monitoring Information	
Indicator: Fuel Type	
Minimum Frequency: Annually	
Averaging Period: N/A	
Deviation Limit: Fuel other than natural gas fired	
Periodic Monitoring Text: Record the type of fuel used by the unit. If an alternate fuel is fired, either alone or in combination with the specified gas, it shall be considered and reported as a deviation.	

Periodic Monitoring Summary

Unit/Group/Process Information	
ID No.: GRP-HEATERS	
Control Device ID No.: N/A	Control Device Type: N/A
Applicable Regulatory Requirement	
Name: 30 TAC Chapter 111, Visible Emissions	SOP Index No.: R1111-2
Pollutant: Opacity	Main Standard: § 111.111(a)(1)(A)
Monitoring Information	
Indicator: Fuel Type	
Minimum Frequency: Annually	
Averaging Period: N/A	
Deviation Limit: Fuel other than natural gas fired	
Periodic Monitoring Text: Record the type of fuel used by the unit. If an alternate fuel is fired, either alone or in combination with the specified gas, it shall be considered and reported as a deviation.	

Periodic Monitoring Summary

Unit/Group/Process Information	
ID No.: GRP-TURBINES 1	
Control Device ID No.: N/A	Control Device Type: N/A
Applicable Regulatory Requirement	
Name: 30 TAC Chapter 111, Visible Emissions	SOP Index No.: R1111-2
Pollutant: Opacity	Main Standard: § 111.111(a)(1)(A)
Monitoring Information	
Indicator: Fuel Type	
Minimum Frequency: Annually	
Averaging Period: N/A	
Deviation Limit: Fuel other than natural gas fired	
Periodic Monitoring Text: Record the type of fuel used by the unit. If an alternate fuel is fired, either alone or in combination with the specified gas, it shall be considered and reported as a deviation.	

Periodic Monitoring Summary

Unit/Group/Process Information	
ID No.: GRP-TURBINES 2	
Control Device ID No.: N/A	Control Device Type: N/A
Applicable Regulatory Requirement	
Name: 40 CFR Part 60, Subpart GG	SOP Index No.: 60GG-1
Pollutant: NO _x	Main Standard: § 60.332(a)(2)
Monitoring Information	
Indicator: Fuel consumption	
Minimum Frequency: Four times per hour	
Averaging Period: N/A	
Deviation Limit: Maximum fuel consumption shall not exceed 75.34 MMBTU/hr.	
<p>Periodic Monitoring Text: Measure and record fuel consumption. Establish a maximum fuel consumption limit using the most appropriate of the following: the most recent performance test data, manufacturer's recommendations, engineering calculations, and/or historical data. The monitoring instrumentation shall be maintained, calibrated, and operated in accordance with the manufacturer's specifications or other written procedures. Any monitoring data above the maximum limit shall be considered and reported as a deviation.</p>	

Periodic Monitoring Summary

Unit/Group/Process Information	
ID No.: GRP-TURBINES 2	
Control Device ID No.: N/A	Control Device Type: N/A
Applicable Regulatory Requirement	
Name: 40 CFR Part 60, Subpart GG	SOP Index No.: 60GG-1
Pollutant: NO _x	Main Standard: § 60.332(a)(2)
Monitoring Information	
Indicator: NO _x concentration	
Minimum Frequency: Semi-annually for at least one of the two turbines.	
Averaging Period: N/A	
Deviation Limit: Maximum NO _x concentration shall not exceed 25 ppmv corrected to 15% O ₂ .	
<p>Periodic Monitoring Text: The semi-annual evaluation of compressor turbine performance shall be conducted for at least one of the two turbines. If neither turbine has operated for more than 2,000 hours in the current six-month period, testing may be delayed until the six-month period when operation has reached 2,000 hours since the last test. Monitor and record the nitrogen oxide concentration in the exhaust stream using a portable analyzer to monitor nitrogen oxide. The portable analyzer shall be operated in accordance with the Environmental Protection Agency's, Office of Air Quality Planning & Standards, Emission Measurement Center Conditional Test Method - Determination of Oxygen, Carbon Monoxide and Oxides of Nitrogen from Stationary Sources For Periodic Monitoring (Portable Electrochemical Analyzer Procedure) [CTM-034] (September 8, 1999). NO_x emissions shall be corrected/calculated in units of the underlying applicable emission limitation (grams per horsepower hour, pounds per MMBtu, pounds per hour).</p>	

Periodic Monitoring Summary

Unit/Group/Process Information	
ID No.: GRP-TURBINES 2	
Control Device ID No.: N/A	Control Device Type: N/A
Applicable Regulatory Requirement	
Name: 30 TAC Chapter 111, Visible Emissions	SOP Index No.: R1111-1
Pollutant: Opacity	Main Standard: § 111.111(a)(1)(B)
Monitoring Information	
Indicator: Fuel Type	
Minimum Frequency: Annually	
Averaging Period: N/A	
Deviation Limit: Fuel other than natural gas fired	
Periodic Monitoring Text: Record the type of fuel used by the unit. If an alternate fuel is fired, either alone or in combination with the specified gas, it shall be considered and reported as a deviation.	

Periodic Monitoring Summary

Unit/Group/Process Information	
ID No.: TURB B1	
Control Device ID No.: N/A	Control Device Type: N/A
Applicable Regulatory Requirement	
Name: 30 TAC Chapter 111, Visible Emissions	SOP Index No.: R1111-1
Pollutant: Opacity	Main Standard: § 111.111(a)(1)(B)
Monitoring Information	
Indicator: Fuel Type	
Minimum Frequency: Annually	
Averaging Period: N/A	
Deviation Limit: Fuel other than natural gas fired	
Periodic Monitoring Text: Record the type of fuel used by the unit. If an alternate fuel is fired, either alone or in combination with the specified gas, it shall be considered and reported as a deviation.	

Permit Shield

Permit Shield 22

Permit Shield

The Executive Director of the TCEQ has determined that the permit holder is not required to comply with the specific regulation(s) identified for each emission unit, group, or process in this table.

Unit / Group / Process ID No.	Group / Inclusive Units	Regulation	Basis of Determination
AUX 01	N/A	40 CFR Part 60, Subpart JJJJ	Stationary SI ICE was constructed prior to 07/01/2008 and was not modified/reconstructed after 06/12/2006.
FUGITIVE-CO3	N/A	40 CFR Part 60, Subpart KKK	Facility is not a natural gas processing plant.
FUGITIVE-CO3	N/A	40 CFR Part 63, Subpart HH	Facility is not a natural gas production facility.
FUGITIVE-CO3	N/A	40 CFR Part 63, Subpart HHH	Facility is not a major source of HAPs.
GRP-HEATERS	HTR-1, HTR-2	40 CFR Part 60, Subpart JJJJ	Unit does not meet the definition of a boiler. Does not heat or boil water.
GRP-TANKS	TANK 1, TANK 2, TANK 3, TANK 4, TANK 5, TANK 6, TANK 7, TANK 8	40 CFR Part 60, Subpart Kb	Storage vessel capacity is less than 75 m3.
GRP-TURBINES 1	TURB A1, TURB A2, TURB A3	40 CFR Part 60, Subpart GG	Stationary gas turbine was constructed prior to and not modified/reconstructed after 10/03/1977.
GRP-TURBINES 1	TURB A1, TURB A2, TURB A3	40 CFR Part 60, Subpart KKKK	Stationary combustion turbine was constructed prior to and not modified/reconstructed after 02/18/2005.
GRP-TURBINES 1	TURB A1, TURB A2, TURB A3	40 CFR Part 60, Subpart OOOO	Facility was constructed prior to and not modified/reconstructed after 08/23/2011.
GRP-TURBINES 2	TURB C1, TURB C2	40 CFR Part 60, Subpart KKKK	Stationary combustion turbine was constructed prior to and not modified/reconstructed after 02/18/2005.
GRP-TURBINES 2	TURB C1, TURB C2	40 CFR Part 60, Subpart OOOO	Facility was constructed prior to and not modified/reconstructed after 08/23/2011.
TURB B1	N/A	40 CFR Part 60, Subpart KKKK	Stationary combustion turbine was constructed prior to and not modified/reconstructed after 02/18/2005.

Permit Shield

The Executive Director of the TCEQ has determined that the permit holder is not required to comply with the specific regulation(s) identified for each emission unit, group, or process in this table.

Unit / Group / Process ID No.	Group / Inclusive Units	Regulation	Basis of Determination
TURB B1	N/A	40 CFR Part 60, Subpart OOOO	Facility was constructed prior to and not modified/reconstructed after 08/23/2011.

New Source Review Authorization References

New Source Review Authorization References 25

New Source Review Authorization References by Emission Unit 26

New Source Review Authorization References

The New Source Review authorizations listed in the table below are applicable requirements under 30 TAC Chapter 122 and enforceable under this operating permit.

Prevention of Significant Deterioration (PSD) Permits	
PSD Permit No.: PSDTX1030	Issuance Date: 06/08/2023
Title 30 TAC Chapter 116 Permits, Special Permits, and Other Authorizations (Other Than Permits By Rule, PSD Permits, or NA Permits) for the Application Area.	
Authorization No.: 53763	Issuance Date: 06/08/2023
Permits By Rule (30 TAC Chapter 106) for the Application Area	
Number: 82	Version No./Date: 12/01/1972
Number: 106.352	Version No./Date: 09/04/2000
Number: 106.355	Version No./Date: 11/01/2001
Number: 106.359	Version No./Date: 09/10/2013
Number: 106.472	Version No./Date: 09/04/2000
Number: 106.511	Version No./Date: 03/14/1997
Number: 106.512	Version No./Date: 06/13/2001

New Source Review Authorization References by Emissions Unit

The following is a list of New Source Review (NSR) authorizations for emission units listed elsewhere in this operating permit. The NSR authorizations are applicable requirements under 30 TAC Chapter 122 and enforceable under this operating permit.

Unit/Group/Process ID No.	Emission Unit Name/Description	New Source Review Authorization**
AUX 01	WAUKESHA H24GL SI ICE - 4SLB 500HP	106.511/03/14/1997
FUGITIVE-CO3	PIPING FUGITIVES	53763, PSDTX1030
HTR-1	REZNOR XL-75 COMFORT HEATER	106.352/09/04/2000
HTR-2	MODINE PA150AB COMFORT HEATER	106.352/09/04/2000
TANK 1	LUBE OIL STORAGE TANK	106.472/09/04/2000
TANK 2	LUBE OIL STORAGE TANK	106.472/09/04/2000
TANK 3	LUBE OIL STORAGE TANK	106.472/09/04/2000
TANK 4	USED OIL STORAGE TANK	106.472/09/04/2000
TANK 5	USED OIL STORAGE TANK	106.472/09/04/2000
TANK 6	WASTE/SLOP OIL UNDERGROUND STORAGE TANK	106.472/09/04/2000
TANK 7	AMBITROL STORAGE TANK	106.472/09/04/2000
TANK 8	RAW WATER STORAGE TANK	106.472/09/04/2000
TURB A1	GE FRAME3 TURBINE - 5400HP	82/12/01/1972 [111075, 111076]
TURB A2	GE FRAME3 TURBINE - 5400HP	82/12/01/1972 [111075, 111076]
TURB A3	GE FRAME3 TURBINE - 5400HP	82/12/01/1972 [111075, 111076]
TURB B1	GE FRAME3 TURBINE - 10490HP	106.512/06/13/2001 [47467]
TURB C1	SOLAR TAURUS 70 TURBINE - 10394HP	53763, PSDTX1030
TURB C2	SOLAR TAURUS 70 TURBINE - 10394HP	53763, PSDTX1030

**This column may include Permit by Rule (PBR) numbers and version dates, PBR Registration numbers in brackets, Standard Permit Registration numbers, Minor NSR permit numbers, and Major NSR permit numbers.

Appendix A

Acronym List 28

Acronym List

The following abbreviations or acronyms may be used in this permit:

ACFM	actual cubic feet per minute
AMOC	alternate means of control
ARP	Acid Rain Program
ASTM	American Society of Testing and Materials
B/PA	Beaumont/Port Arthur (nonattainment area)
CAM	Compliance Assurance Monitoring
CD	control device
CEMS	continuous emissions monitoring system
CFR	Code of Federal Regulations
COMS	continuous opacity monitoring system
CVS	closed vent system
D/FW	Dallas/Fort Worth (nonattainment area)
EP	emission point
EPA	U.S. Environmental Protection Agency
EU	emission unit
FCAA Amendments	Federal Clean Air Act Amendments
FOP	federal operating permit
gr/100 scf	grains per 100 standard cubic feet
HAP	hazardous air pollutant
H/G/B	Houston/Galveston/Brazoria (nonattainment area)
H ₂ S	hydrogen sulfide
ID No.	identification number
lb/hr	pound(s) per hour
MACT	Maximum Achievable Control Technology (40 CFR Part 63)
MMBtu/hr	Million British thermal units per hour
NA	nonattainment
N/A	not applicable
NADB	National Allowance Data Base
NESHAP	National Emission Standards for Hazardous Air Pollutants (40 CFR Part 61)
NO _x	nitrogen oxides
NSPS	New Source Performance Standard (40 CFR Part 60)
NSR	New Source Review
ORIS	Office of Regulatory Information Systems
Pb	lead
PBR	Permit By Rule
PEMS	predictive emissions monitoring system
PM	particulate matter
ppmv	parts per million by volume
PRO	process unit
PSD	prevention of significant deterioration
psia	pounds per square inch absolute
RO	Responsible Official
SIP	state implementation plan
SO ₂	sulfur dioxide
TCEQ	Texas Commission on Environmental Quality
TSP	total suspended particulate
TVP	true vapor pressure
U.S.C.	United States Code
VOC	volatile organic compound

Appendix B

Major NSR Summary Table 30

Major NSR Summary Table

Permit Numbers: 53763 and PSDTX1030					Issuance Date: June 8, 2023		
Emission Point No. (1)	Source Name (2)	Air Contaminant Name (3)	Emission Rates *		Monitoring and Testing Requirements	Recordkeeping Requirements	Reporting Requirements
			lbs/hour	TPY **	Special Conditions/ Application Information	Special Conditions/ Application Information	Special Conditions/ Application Information
TURB-C01	Turbine 1 Taurus 70	NO _x	7.60	33.3	2, 5, 7, 9, 10, 11, 12	2, 5, 9, 10, 11, 12, 13, 14, 15	2, 9, 15
		CO	9.22	40.4			
		VOC	0.26	1.2			
		PM	0.55	2.4			
		SO ₂	2.9	1.2			
TURB-C02	Turbine 2 Taurus 70	NO _x	7.60	33.3	2, 5, 7, 9, 10, 11, 12	2, 5, 9, 10, 11, 12, 13, 14, 15	2, 9, 15
		CO	9.22	40.4			
		VOC	0.26	1.2			
		PM	0.55	2.4			
		SO ₂	2.9	1.2			
FUGITIVE-C03	Fugitives (4)	VOC	0.13	0.56			

- (1) Emission point identification - either specific equipment designation or emission point number from a plot plan.
- (2) Specific point source names. For fugitive sources, use an area name or fugitive source name.
- (3) VOC - volatile organic compounds as defined in Title 30 Texas Administrative Code §101.1
 NO_x - total oxides of nitrogen
 SO₂ - sulfur dioxide
 PM - particulate matter, suspended in the atmosphere, including PM₁₀.
 PM₁₀ - particulate matter equal to or less than 10 microns in diameter. Where PM is not listed, it shall be assumed that no particulate matter greater than 10 microns is emitted.
 CO - carbon monoxide
- (4) Fugitive emissions are an estimate only and should not be considered as a maximum allowable emission rate.

* Emission rates are based on and the facilities are limited by the following maximum operating schedule:
 ___ Hrs/day ___ Days/week ___ Weeks/year or 8,760 Hrs/year

** Compliance with annual emission limits is based on a rolling 12-month period.

**Texas Commission on Environmental Quality
Air Quality Permit**

A Permit Is Hereby Issued To
El Paso Natural Gas Company, L.L.C.
Authorizing the Continued Operation of
Cornudas Compressor Station
Located at Dell City, Hudspeth County, Texas
Latitude 31.703 Longitude -105.457

Permits: 53763 and PSDTX1030

Issuance Date: June 8, 2023

Expiration Date: June 8, 2033



For the Commission

1. **Facilities** covered by this permit shall be constructed and operated as specified in the application for the permit. All representations regarding construction plans and operation procedures contained in the permit application shall be conditions upon which the permit is issued. Variations from these representations shall be unlawful unless the permit holder first makes application to the Texas Commission on Environmental Quality (commission) Executive Director to amend this permit in that regard and such amendment is approved. [Title 30 Texas Administrative Code (TAC) Section 116.116 (30 TAC § 116.116)] ¹
2. **Voiding of Permit.** A permit or permit amendment is automatically void if the holder fails to begin construction within 18 months of the date of issuance, discontinues construction for more than 18 months prior to completion, or fails to complete construction within a reasonable time. Upon request, the executive director may grant an 18-month extension. Before the extension is granted the permit may be subject to revision based on best available control technology, lowest achievable emission rate, and netting or offsets as applicable. One additional extension of up to 18 months may be granted if the permit holder demonstrates that emissions from the facility will comply with all rules and regulations of the commission, the intent of the Texas Clean Air Act (TCAA), including protection of the public's health and physical property; and (b)(1) the permit holder is a party to litigation not of the permit holder's initiation regarding the issuance of the permit; or (b)(2) the permit holder has spent, or committed to spend, at least 10 percent of the estimated total cost of the project up to a maximum of \$5 million. A permit holder granted an extension under subsection (b)(1) of this section may receive one subsequent extension if the permit holder meets the conditions of subsection (b)(2) of this section. [30 TAC § 116.120]
3. **Construction Progress.** Start of construction, construction interruptions exceeding 45 days, and completion of construction shall be reported to the appropriate regional office of the commission not later than 15 working days after occurrence of the event. [30 TAC § 116.115(b)(2)(A)]
4. **Start-up Notification.** The appropriate air program regional office shall be notified prior to the commencement of operations of the facilities authorized by the permit in such a manner that a representative of the commission may be present. The permit holder shall provide a separate notification for the commencement of operations for each unit of phased construction, which may involve a series of units commencing operations at different times. Prior to operation of the facilities authorized by the permit, the permit holder shall identify the source or sources of allowances to be utilized for compliance with Chapter 101, Subchapter H, Division 3 of this title (relating to Mass Emissions Cap and Trade Program). [30 TAC § 116.115(b)(2)(B)]
5. **Sampling Requirements.** If sampling is required, the permit holder shall contact the commission's Office of Compliance and Enforcement prior to sampling to obtain the proper data forms and procedures. All sampling and testing procedures must be approved by the executive director and coordinated with the regional representatives of the commission. The permit holder is also responsible for providing sampling facilities and conducting the sampling operations or contracting with an independent sampling consultant. [30 TAC § 116.115(b)(2)(C)]
6. **Equivalency of Methods.** The permit holder must demonstrate or otherwise justify the equivalency of emission control methods, sampling or other emission testing methods, and monitoring methods proposed as alternatives to methods indicated in the conditions of the permit. Alternative methods shall be applied for in writing and must be reviewed and approved by the executive director prior to their use in fulfilling any requirements of the permit. [30 TAC § 116.115(b)(2)(D)]
7. **Recordkeeping.** The permit holder shall maintain a copy of the permit along with records containing the information and data sufficient to demonstrate compliance with the permit, including production records and operating hours;

keep all required records in a file at the plant site. If, however, the facility normally operates unattended, records shall be maintained at the nearest staffed location within Texas specified in the application; make the records available at the request of personnel from the commission or any air pollution control program having jurisdiction in a timely manner; comply with any additional recordkeeping requirements specified in special conditions in the permit; and retain information in the file for at least two years following the date that the information or data is obtained. [30 TAC § 116.115(b)(2)(E)]

8. **Maximum Allowable Emission Rates.** The total emissions of air contaminants from any of the sources of emissions must not exceed the values stated on the table attached to the permit entitled "Emission Sources-- Maximum Allowable Emission Rates." [30 TAC § 116.115(b)(2)(F)]¹
9. **Maintenance of Emission Control.** The permitted facilities shall not be operated unless all air pollution emission capture and abatement equipment is maintained in good working order and operating properly during normal facility operations. The permit holder shall provide notification in accordance with 30 TAC §101.201, 101.211, and 101.221 of this title (relating to Emissions Event Reporting and Recordkeeping Requirements; Scheduled Maintenance, Startup, and Shutdown Reporting and Recordkeeping Requirements; and Operational Requirements). [30 TAC § 116.115(b)(2)(G)]
10. **Compliance with Rules.** Acceptance of a permit by an applicant constitutes an acknowledgment and agreement that the permit holder will comply with all rules and orders of the commission issued in conformity with the TCAA and the conditions precedent to the granting of the permit. If more than one state or federal rule or regulation or permit condition is applicable, the most stringent limit or condition shall govern and be the standard by which compliance shall be demonstrated. Acceptance includes consent to the entrance of commission employees and agents into the permitted premises at reasonable times to investigate conditions relating to the emission or concentration of air contaminants, including compliance with the permit. [30 TAC § 116.115(b)(2)(H)]
11. **This** permit may not be transferred, assigned, or conveyed by the holder except as provided by rule. [30 TAC § 116.110(e)]
12. **There** may be additional special conditions attached to a permit upon issuance or modification of the permit. Such conditions in a permit may be more restrictive than the requirements of Title 30 of the Texas Administrative Code. [30 TAC § 116.115(c)]
13. **Emissions** from this facility must not cause or contribute to "air pollution" as defined in Texas Health and Safety Code (THSC) §382.003(3) or violate THSC § 382.085. If the executive director determines that such a condition or violation occurs, the holder shall implement additional abatement measures as necessary to control or prevent the condition or violation.
14. **The** permit holder shall comply with all the requirements of this permit. Emissions that exceed the limits of this permit are not authorized and are violations of this permit.¹

¹ Please be advised that the requirements of this provision of the general conditions may not be applicable to greenhouse gas emissions.

Common Acronyms in Air Permits

°C = Temperature in degrees Celsius	GLC _{max} = maximum (predicted) ground-level concentration
°F = Temperature in degrees Fahrenheit	gpm = gallon per minute
°K = Temperature in degrees Kelvin	gr/1000scf = grain per 1000 standard cubic feet
µg = microgram	gr/dscf = grain per dry standard cubic feet
µg/m ³ = microgram per cubic meter	H ₂ CO = formaldehyde
acfm = actual cubic feet per minute	H ₂ S = hydrogen sulfide
AMOC = alternate means of control	H ₂ SO ₄ = sulfuric acid
AOS = alternative operating scenario	HAP = hazardous air pollutant as listed in § 112(b) of the Federal Clean Air Act or Title 40 Code of Federal Regulations Part 63, Subpart C
AP-42 = Air Pollutant Emission Factors, 5th edition	HC = hydrocarbons
APD = Air Permits Division	HCl = hydrochloric acid, hydrogen chloride
API = American Petroleum Institute	Hg = mercury
APWL = air pollutant watch list	HGB = Houston/Galveston/Brazoria
BPA = Beaumont/ Port Arthur	hp = horsepower
BACT = best available control technology	hr = hour
BAE = baseline actual emissions	IFR = internal floating roof tank
bbl = barrel	in H ₂ O = inches of water
bbl/day = barrel per day	in Hg = inches of mercury
bhp = brake horsepower	IR = infrared
BMP = best management practices	ISC3 = Industrial Source Complex, a dispersion model
Btu = British thermal unit	ISCST3 = Industrial Source Complex Short-Term, a dispersion model
Btu/scf = British thermal unit per standard cubic foot or feet	K = Kelvin; extension of the degree Celsius scaled-down to absolute zero
CAA = Clean Air Act	LACT = lease automatic custody transfer
CAM = compliance-assurance monitoring	LAER = lowest achievable emission rate
CEMS = continuous emissions monitoring systems	lb = pound
cfm = cubic feet (per) minute	lb/day = pound per day
CFR = Code of Federal Regulations	lb/hr = pound per hour
CN = customer ID number	lb/MMBtu = pound per million British thermal units
CNG = compressed natural gas	LDAR = Leak Detection and Repair (Requirements)
CO = carbon monoxide	LNG = liquefied natural gas
COMS = continuous opacity monitoring system	LPG = liquefied petroleum gas
CPMS = continuous parametric monitoring system	LT/D = long ton per day
DFW = Dallas/ Fort Worth (Metroplex)	m = meter
DE = destruction efficiency	m ³ = cubic meter
DRE = destruction and removal efficiency	m/sec = meters per second
dscf = dry standard cubic foot or feet	MACT = maximum achievable control technology
dscfm = dry standard cubic foot or feet per minute	MAERT = Maximum Allowable Emission Rate Table
ED = (TCEQ) Executive Director	MERA = Modeling and Effects Review Applicability
EF = emissions factor	mg = milligram
EFR = external floating roof tank	mg/g = milligram per gram
EGU = electric generating unit	mL = milliliter
EI = Emissions Inventory	MMBtu = million British thermal units
ELP = El Paso	MMBtu/hr = million British thermal units per hour
EPA = (United States) Environmental Protection Agency	MSDS = material safety data sheet
EPN = emission point number	MSS = maintenance, startup, and shutdown
ESL = effects screening level	MW = megawatt
ESP = electrostatic precipitator	NAAQS = National Ambient Air Quality Standards
FCAA = Federal Clean Air Act	NESHAP = National Emission Standards for Hazardous Air Pollutants
FCCU = fluid catalytic cracking unit	NGL = natural gas liquids
FID = flame ionization detector	NNSR = nonattainment new source review
FIN = facility identification number	NO _x = total oxides of nitrogen
ft = foot or feet	NSPS = New Source Performance Standards
ft/sec = foot or feet per second	
g = gram	
gal/wk = gallon per week	
gal/yr = gallon per year	
GLC = ground level concentration	

PAL = plant-wide applicability limit
PBR = Permit(s) by Rule
PCP = pollution control project
PEMS = predictive emission monitoring system
PID = photo ionization detector
PM = periodic monitoring
PM = total particulate matter, suspended in the atmosphere, including PM₁₀ and PM_{2.5}, as represented
PM_{2.5} = particulate matter equal to or less than 2.5 microns in diameter
PM₁₀ = total particulate matter equal to or less than 10 microns in diameter, including PM_{2.5}, as represented
POC = products of combustion
ppb = parts per billion
ppm = parts per million
ppmv = parts per million (by) volume
psia = pounds (per) square inch, absolute
psig = pounds (per) square inch, gage
PTE = potential to emit
RA = relative accuracy
RATA = relative accuracy test audit
RM = reference method
RVP = Reid vapor pressure
scf = standard cubic foot or feet
scfm = standard cubic foot or feet (per) minute
SCR = selective catalytic reduction
SIL = significant impact levels
SNCR = selective non-catalytic reduction
SO₂ = sulfur dioxide
SOCMI = synthetic organic chemical manufacturing industry
SRU = sulfur recovery unit
TAC = Texas Administrative Code
TCAA = Texas Clean Air Act
TCEQ = Texas Commission on Environmental Quality
TD = Toxicology Division
TLV = threshold limit value
TMDL = total maximum daily load
tpd = tons per day
tpy = tons per year
TVP = true vapor pressure
VOC = volatile organic compounds as defined in Title 30 Texas Administrative Code § 101.1
VRU = vapor recovery unit or system

SPECIAL CONDITIONS

Permit Numbers 53763 and PSD-TX-1030

PREVENTION OF SIGNIFICANT DETERIORATION (PSD) OF NATIONAL AMBIENT AIR QUALITY STANDARDS

1. This PSD permit is based on the evaluation of the emissions as represented in the permit application submitted December 2002 and subsequent submittals. The emissions of nitrogen dioxide are subject to PSD control technology and air quality analysis.

FEDERAL APPLICABILITY

2. These facilities shall comply with applicable requirements of the U.S. Environmental Protection Agency (EPA) regulations on Standards of Performance for New Stationary Sources (NSPS) Title 40 Code of Federal Regulations Part 60, Subpart A (40 CFR Part 60, Subpart A), General Provisions, and Subpart GG, Stationary Gas Turbines.

If any condition of this permit is more stringent than the regulations so incorporated, then for the purposes of complying with this permit, the permit shall govern and be the standard by which compliance shall be demonstrated.

EMISSION STANDARDS AND OPERATING SPECIFICATIONS

3. This permit authorizes two Solar Taurus 70 compressor turbines with a nominal rating 10,394-horsepower at 0°F each and the turbines shall be operated normally at full load.
4. Fuel for the gas turbine generators (GTGs) is limited to pipeline-quality natural gas containing no more than 2.0 grain total sulfur per 100 dry standard cubic feet (dscf) on a one-hour average basis and 0.2 grain total sulfur per 100 dscf on a rolling 12-month average basis. The use of any other fuels will require prior authorization from the Executive Director of the Texas Commission on Environmental Quality (TCEQ).
5. Upon request by the Executive Director of the TCEQ or any local air pollution control program having jurisdiction, the holder of this permit shall provide a sample and/or an analysis of the fuels fired in the gas turbines or shall allow air pollution control agency representatives to obtain a sample for analysis.
6. The GTGs at full load, except for periods of start-up, shutdown, upset, or maintenance, shall not exceed 25 parts per million by volume (ppmv) of oxides of nitrogen (NO_x) or 50 ppmv of carbon monoxide (CO), when corrected to 15 percent oxygen (O₂), and without correcting to International Standards Organization (ISO)

SPECIAL CONDITIONS

Permit Numbers 53763 and PSD-TX-1030

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standards.

7. Opacity of emissions from any stack authorized by this permit shall not exceed 5 percent averaged over a six-minute period, except during periods of start-up, shutdown, upset, or maintenance. Opacity shall be determined by the EPA Reference Method (RM) No. 9 during the initial determination of compliance stack sampling.

INITIAL DETERMINATION OF COMPLIANCE

8. Sampling ports and platforms shall be incorporated into the design of all exhaust stacks according to the specifications set forth in the attachment entitled "Chapter 2, Stack Sampling Facilities." Alternate sampling facility designs may be submitted for approval by the TCEQ Regional Director or the TCEQ Compliance Support Division in Austin.
9. The holder of this permit shall perform stack sampling and other testing as required to establish the actual quantities of air contaminants being emitted into the atmosphere from Emission Point Nos. (EPNs) TURB-C01 and TURB-C02. Sampling shall be conducted in accordance with the appropriate procedures of the TCEQ Sampling Procedures Manual and in accordance with EPA RM 201A and 202 or RM 5 modified to include back-half condensibles for the concentration of PM₁₀; RM 8 or RM 6 or 6c for sulfur dioxide (SO₂); RM 9 for opacity; RM 10 for the concentration of CO; RM 25A modified to exclude methane and ethane for the concentration of volatile organic compounds (VOC) to measure total carbon as propane; RM 20 for the concentrations of NO_x and O₂; or by other equivalent methods approved by the TCEQ Compliance Support Division or TCEQ El Paso Regional Director.

Fuel sampling using the methods and procedures of 40 CFR § 60.335(d) may be conducted in lieu of stack sampling for SO₂. If fuel sampling is used, compliance with NSPS Subpart GG SO₂ limits shall be based on 100 percent conversion of the sulfur in the fuel to SO₂. Any deviations from those procedures must be approved by the Executive Director of the TCEQ prior to sampling. The TCEQ Executive Director or designated representative shall be afforded the opportunity to observe all such sampling. The holder of this permit is responsible for providing sampling and testing facilities and conducting the sampling and testing operations at his expense.

- A. The TCEQ El Paso Regional Office shall be contacted as soon as testing is scheduled but not less than 45 days prior to sampling to schedule a pretest meeting.

SPECIAL CONDITIONS

Permit Numbers 53763 and PSD-TX-1030

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The notice shall include:

- (1) Date for pretest meeting.
- (2) Date sampling will occur.
- (3) Name of firm conducting sampling.
- (4) Type of sampling equipment to be used.
- (5) Method or procedure to be used in sampling.
- (6) Procedure used to determine turbine loads during and after the sampling period.

The purpose of the pretest meeting is to review the necessary sampling and testing procedures, to provide the proper data forms for recording pertinent data, and to review the format procedures for submitting the test reports. A written proposed description of any deviation from sampling procedures specified in permit conditions, or the TCEQ or the EPA sampling procedures shall be made available to the TCEQ prior to the pretest meeting. The TCEQ Regional Director or the TCEQ Compliance Support Division in Austin shall approve or disapprove of any deviation from specified sampling procedures. Requests to waive testing for any pollutant specified in this condition shall be submitted to the TCEQ Office of Permitting, Remediation, and Registration, Air Permits Division. Test waivers and alternate or equivalent procedure proposals for NSPS testing which must have the EPA approval shall be submitted to the TCEQ Compliance Support Division in Austin.

- B. Each Turbine (EPNs TURB-C01 and TURB-C02) shall be tested at full load for the atmospheric conditions which exist during testing. Each tested turbine load shall be identified in the sampling report. The permit holder shall present at the pretest meeting the manner in which stack sampling will be executed in order to demonstrate compliance with emission standards found in NSPS Subpart GG.
- C. Air contaminants to be sampled and analyzed while at full load include (but are not limited to) NO_x, O₂, CO, VOC, SO₂, PM₁₀, and opacity. (Fuel sampling using the methods and procedures of 40 CFR § 60.335[d] may be conducted in lieu of stack sampling for SO₂).
- D. Air emissions from each GTG shall be tested while firing at additional partial load conditions to satisfy 40 CFR § 60.335. Air emissions to be sampled and analyzed while at a partial load include (but are not limited to) NO_x, O₂, and CO. Each tested load shall be identified in the sampling report.
- E. The holder of this permit shall demonstrate during the initial compliance testing

SPECIAL CONDITIONS

Permit Numbers 53763 and PSD-TX-1030

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that the best available control technology has been selected for the GTGs by demonstrating that the concentrations listed below will not be exceeded, when corrected to 15 percent O₂, and without correcting to ISO conditions.

- (1) The stack concentration of NO_x shall not exceed 25 ppmv at full load..
 - (2) The stack concentration of CO shall not exceed 50 ppmv at full load.
 - (3) The stack concentration of VOC (calculated as propane), defined as total hydrocarbons minus methane and ethane, shall not exceed 2.5 ppmv at full load.
- F. Sampling of each GTG shall occur within 60 days after achieving the maximum fuel firing rate at which the units will be operated but no later than 180 days after initial start-up of each unit. Additional sampling shall occur as may be required by the TCEQ or EPA.
- G. Within 60 days after the completion of the testing and sampling required herein, three copies of the sampling reports shall be distributed as follows:
- One copy to the TCEQ El Paso Regional Office.
 - One copy to the TCEQ Compliance Support Division, Austin.
 - One copy to the EPA Region 6 Office, Dallas.

CONTINUOUS DETERMINATION OF COMPLIANCE

10. In order to demonstrate that the emission limits specified in Special Condition No. 6 are continuously met, the holder of this permit shall conduct a semiannual evaluation of compressor turbine performance at the maximum load achievable based on ambient and available gas supply conditions for at least one of the two turbines by measuring the NO_x, CO, and O₂ content of the exhaust. If neither turbine has operated for more than 2,000 hours in the current six-month period, testing may be delayed until the six-month period when operation has reached 2,000 hours since the last test. The use of portable analyzers specifically designed for measuring the concentration of each contaminant in pounds per million is acceptable for this evaluation. A hot air probe or equivalent should be used with portable analyzers to prevent introduction of error in results because of high stack temperatures. Three sets of measurements should be averaged to determine the concentrations. Prior to and following the measurements, the portable analyzer shall be checked for accuracy using an audit gas that conforms to the specifications in 40 CFR § 60, Appendix F, 5.1.2(3). Any other method must

SPECIAL CONDITIONS

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be approved by the TCEQ Regional Director or the TCEQ Compliance Support Division.

Emissions shall be measured and recorded in the as-found operating condition, except no compliance determination shall be established during start-up, shutdown, or under breakdown conditions. Emission rates shall be reported in ppmv and corrected to 15 percent O₂ content.

11. The holder of this permit shall additionally install, calibrate, maintain, and operate continuous monitoring systems to monitor and record the average hourly natural gas consumption of the gas turbines. The systems shall be accurate to ± 5.0 percent of the unit's maximum flow.
12. The holder of this permit shall comply with all sulfur monitoring and recordkeeping requirements of NSPS Subpart GG. Any request for a custom monitoring schedule shall be made in writing and directed to the TCEQ Compliance Support Division in Austin. Any custom schedule approved by TCEQ will be recognized as an enforceable condition of this permit.

RECORDKEEPING REQUIREMENTS

13. The following records shall be kept at the plant for the life of the permit. All records required in this permit shall be made available at the request of personnel from the TCEQ, EPA, or any air pollution control agency with jurisdiction.
 - A. A copy of this permit.
 - B. Permit application submitted December 2002 and any subsequent representations submitted to the TCEQ.
 - C. A complete copy of the testing reports and records of the initial performance testing completed pursuant to Special Condition No. 9 to demonstrate initial compliance.
14. The following information shall be maintained at the plant by the holder of this permit in a form suitable for inspection for a period of five years after collection and shall be made immediately available upon request to representatives of the TCEQ, EPA, or any local air pollution control program having jurisdiction.
 - A. Records of the hours of operation and average daily quantity of natural gas

fired in the turbines.

- B. Stack sampling results or other air emissions testing that may be conducted on units authorized under this permit after the date of issuance of this permit.

REPORTING

- 15. Recognition in this permit that there might be periods of time due to start-up, shutdown, upset, or maintenance when emissions may exceed permit limitations shall not be construed to relieve the permit holder from the reporting requirements of Title 30 Texas Administrative Code §§ 101.201 and 101.211.

Dated November 6, 2003

EMISSION SOURCES - MAXIMUM ALLOWABLE EMISSION RATES

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This table lists the maximum allowable emission rates and all sources of air contaminants on the applicant's property covered by this permit. The emission rates shown are those derived from information submitted as part of the application for permit and are the maximum rates allowed for these facilities. Any proposed increase in emission rates may require an application for a modification of the facilities covered by this permit.

AIR CONTAMINANTS DATA

Emission Point No. (1)	Source Name (2)	Air Contaminant Name (3)	Emission Rates *	
			lb/hr	TPY**
TURB-C01	Turbine 1 Taurus 70	NO _x	7.60	33.3
		CO	9.22	40.4
		VOC 0.26	1.2	
		PM 0.55	2.4	
		SO ₂ 2.9	1.2	
TURB-C02	Turbine 2 Taurus 70	NO _x	7.60	33.3
		CO	9.22	40.4
		VOC 0.26	1.2	
		PM 0.55	2.4	
		SO ₂ 2.9	1.2	
FUGITIVE-C03	Fugitives (4)	VOC	0.13	0.56

(1) Emission point identification - either specific equipment designation or emission point number from a plot plan.

(2) Specific point source names. For fugitive sources, use an area name or fugitive source name.

(3) VOC - volatile organic compounds as defined in Title 30 Texas Administrative Code § 101.1

NO_x - total oxides of nitrogen

SO₂ - sulfur dioxide

PM - particulate matter, suspended in the atmosphere, including PM₁₀.

PM₁₀ - particulate matter equal to or less than 10 microns in diameter. Where PM is not listed, it shall be assumed that no particulate matter greater than 10 microns is emitted.

CO - carbon monoxide

(4) Fugitive emissions are an estimate only and should not be considered as a maximum allowable emission rate.

* Emission rates are based on and the facilities are limited by the following maximum operating schedule:

_____ Hrs/day ___ Days/week ___ Weeks/year or 8,760 Hrs/year

EMISSION SOURCES - MAXIMUM ALLOWABLE EMISSION RATES

AIR CONTAMINANTS DATA

Emission Point No. (1)	Source Name (2)	Air Contaminant Name (3)	Emission Rates *	
			lb/hr	TPY**

** Compliance with annual emission limits is based on a rolling 12-month period.

Dated November 6, 2003